

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**HUNTINGTON DIVISION**

**UNITED STATES OF AMERICA**

**vs.**

**Case No.: 3:22-cr-0087**

**ALEX KAI TICK CHIN**

**MOTION TO CONTINUE JURY TRIAL**

Comes now the defendant, by and through the undersigned counsel and hereby respectfully requests the court to continue the Jury Trial and all deadlines presently set in this matter. In support of which the undersigned counsel states the defendant Alex Kai Tick Chin has retained the undersigned counsel on 3/24/2023. The undersigned counsel is still in the process of going through the discovery and furthermore has retained an expert witness who is assisting the Defendant and the undersigned counsel in reviewing the discovery also.

It is also the undersigned counsels understanding that there was a new cell phone extraction that was completed in this case recently. The undersigned counsel has not received this as of yet, but is currently making arrangements to obtain this and review it with his expert.

Furthermore, as the court is well aware, this is a case in which, if convicted, Mr. Chin is looking at a lengthy sentence, and ample time and resources will be needed to properly defend him to the best of the undersigned counsels ability.

The undersigned counsel has conferred with Mr. Chin, and he has no objection to waiving his speedy trial rights in this situation. The undersigned counsel has also spoken with AUSA Jenny Herrald who states that she has no objection to the

continuance in this matter. The undersigned counsel would ask for a sixty (60) day delay in the Jury Trial date and the deadlines.

Respectfully submitted this 1st day of May, 2023

ALEX KAI TICK CHIN  
By Counsel

Very truly yours,  
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s/ Sebastian M. Joy  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing **MOTION TO CONTINUE JURY TRIAL** has been electronically filed with the Clerk of Court this date using the CM/ECF system and served upon opposing counsel as follows:

**VIA CM/ECF:** Jenny Herrald, Esq. AUSA  
Office of United States Attorney  
Southern District of West Virginia  
300 Virginia Street East, Room 4000  
Charleston, West Virginia 25301

**DATE:** May 1, 2023

Very truly yours,

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